

From: Roe, Dilan, Env. Health
To: ["Ravi@missionvalleyhomes.com"](mailto:Ravi@missionvalleyhomes.com)
Cc: ["Shawn Munger"](#); ["Morgan Johnson"](#)
Subject: FW: Jordan Ranch Update, RO2918
Date: Tuesday, September 04, 2012 5:11:00 PM
Attachments: [image001.png](#)
[WP_R_2012-08-16_2.pdf](#)

Ravi:

As discussed over the phone this afternoon, I have attached an example of the type of a site conceptual model and work plan I would like to see ENGEO prepare and submit with an Interim Remedial Action Work Plan for groundwater extraction at the Jordan Ranch site. The work plan should be concise but provide sufficient detail (text, assumptions, calculations, drawings, construction methods, specifications, costs, schedule, etc) to support the siting, design, construction, operation, and monitoring of the system. Based on my review of the details provided so far, additional details and justification needed include (if applicable):

- Soil Excavation - excavation amounts, sidewall/base sampling, stockpiling procedures, treatment, confirmation samples, disposal, etc
- Groundwater Extraction and Treatment (during excavation) - methods
- Trench Design Backfill – gravel depth and volume, soil backfill (clean import versus reuse of excavated soil), filter fabric, etc.
- Extraction well design - casing, filter pack, pump specs, groundwater flow estimates (need to support)
- Groundwater extraction system operation and monitoring – baker tanks, acceptance criteria at EBMUD, total volume extracted, permits
- Contingency plans – to address unexpected conditions if observed during field activities (i.e., soil caving, soil staining, odor, red-legged frogs, COC levels too high for disposal at EBMUD, etc)
- System Shutdown and Decommissioning - performance metrics, well abandonment, etc
- Cost estimate
- Schedule (construction, operation, monitoring, decommissioning)

Please also provide an overview of the proposed site development and overall remediation strategy for the site and anticipated steps towards gaining site closure (CAP supported by updated SCM, soil vapor monitoring, other remedial strategies, etc).

I will be available on Thursday or Friday this week to discuss this further. I would like to have a document submitted that can be reviewed easily and supports your recommendation. It is up to you to tell the story.

Regards,

Dilan Roe, P.E.

Hazardous Materials Specialist

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
QIC: 30440
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From: Roe, Dilan, Env. Health
Sent: Tuesday, September 04, 2012 4:04 PM
To: 'Ravi@missionvalleyhomes.com'
Cc: 'Morgan Johnson'; 'Shawn Munger'
Subject: RE: Jordan Ranch Update

Ravi:

I would like to schedule a conference call with you and your consultants, Morgan Johnson and Shawn Munger with ENGeo, to discuss the Jordan Ranch Project. As discussed in our meeting on August 20, 2012 and reiterated in my email dated August 24, 2012, ACEH is committed to helping you move this project forward and working with you and your consultants in crafting a schedule that incorporates the requisite environmental cleanup process and facilitates site redevelopment. That being said, I have reviewed your recent request and strategies to allow you to commence with the installation of a groundwater extraction trench while concurrently working on the project schedule, revised SCM and amended corrective action plan. However, regardless of whether the groundwater extraction trench is approved as part of a new corrective action plan or as an interim remedial action, details of the system design, construction, and operation must be submitted to ACEH and supported by a site conceptual model and engineering calculations.

At this juncture, we are being asked to grant you authorization to proceed with construction and operation of a proposed trench system for groundwater extraction based on a trench design presented in a few paragraphs of an email and two figures showing the approximate location of the trench and a cross section of the excavation trench. I am willing to explore the possibility of constructing the trench as an interim remedial action; however in order to do so ACEH will need to be able to assess whether the proposed groundwater extraction trench system would be consistent with the intent of the groundwater extraction component presented in the approved Final Corrective Action Plan dated May 25, 2011, prepared by ENGeo. If approved as an interim remedial action, you could construct the trench concurrently with development of the project schedule, SCM, and new CAP.

Therefore, if you want to pursue this path you will need to submit a Interim Remedial Action Work Plan providing details of the design, construction, and operation of the groundwater extraction system accompanied by a site conceptual model and discussion about how the proposed strategy is consistent with the approved CAP.

I would like to schedule a teleconference call to discuss this approach further.

Regards,

Dilan Roe, P.E.

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From: Morgan Johnson [<mailto:mjohnson@engeo.com>]
Sent: Tuesday, August 28, 2012 1:02 PM
To: Roe, Dilan, Env. Health; Ravi@missionvalleyhomes.com
Cc: Shawn Munger
Subject: RE: Jordan Ranch Update

Dilan,

Thank you very much for your timely response. While we agree that the previously approved SCM needs to be updated and the vapor barrier mitigation we discussed should be included in an amended CAP, we have a concern with your message and the forthcoming directive letter. Your message suggests that groundwater extraction should be delayed until the amended CAP is submitted and possibly approved. Please confirm this request as it will create a significant delay to the field work and would make the trench installation more difficult, if not impossible, if it is delayed and has to occur during the rainy season. Our client, BJP-ROF Jordan Ranch, LLC has a buyer for the property (Parcel "H") once the remediation is completed which contributes to their sense of urgency.

As you know, preparation of an amended CAP, review by ACEH, and any public noticing requirements, may take several months to complete. In the event rainfall occurs, access for installation of the trench alternative may be compromised, and the remediation may be delayed unnecessarily. We are hopeful ACEH can gain comfort allowing the property owner to pursue the field work, concurrent with the completion of the project schedule, revised SCM, and amended CAP.

There are several reasons ACEH can decide to support this concurrent approach and trench/groundwater extraction proposal. ACEH previously approved groundwater extraction from the open UST excavation in 2011. The only change to the proposed plan is

that the extraction would occur from a trench 10 feet away from the larger excavation sites previously utilized. Based on the recent soil boring data and our current understanding of the SCM, we believe the trench will be very effective in removing mass within the isolated water-bearing zones down gradient of the excavation.

The trench and groundwater extraction proposal are described on the attached plan view and cross sections. The dimensions of the proposed extraction trench are 50 feet in length by 4 feet in width with a maximum depth of 26 feet. The extraction well casing will be installed in the center of the trench, and will consist of a 6 to 8 inch diameter inner casing and a 12 to 14 inch diameter outer casing, with a sand pack placed in the annular space. We anticipate a well yield of approximately 10 to 20 gallons per minute. Groundwater extraction will be performed with a 25 cc Honda centrifugal pump into 20,000 gallon baker tanks. The containerized water will be profiled and disposed of at the East Bay MUD facility.

Dilan, we hope you can see the merit of commencing this work immediately. A licensed contractor is prepared to mobilize within 10 days to excavate the trench and extraction well, which will require two days. Respectfully, we request your authorization to proceed with the groundwater extraction at our risk and we acknowledge other remedial measures may be required by ACEH. Concurrent with the field work, we will complete the project schedule, revised SCM and amended CAP.

Thank you again for your timely feedback and in advance for your cooperation. We hope you can view this message with some understanding and flexibility. Please understand, BJP-ROF Jordan Ranch, LLC and ENGEO are completely committed to meeting or exceeding ACEH expectations and our team would like to complete the remediation and obtain closure as quickly and efficiently as possible.

Sincerely,

Morgan

From: Roe, Dilan, Env. Health [<mailto:Dilan.Roe@acgov.org>]
Sent: Friday, August 24, 2012 1:58 PM
To: Ravi@missionvalleyhomes.com
Cc: Morgan Johnson; Shawn Munger
Subject: RE: Jordan Ranch Update

Hi Ravi:

I just left Shawn a voice message regarding our decision about moving forward with construction of the proposed trench system for groundwater extraction and treatment as discussed in our meeting earlier this week, but thought I would follow up with an email to you. We have reviewed the Final Updated Corrective Action Plan (CAP) dated May 25, 2011, prepared by ENGEO, to evaluate

whether it would cover the construction of the proposed trench system. Based on our review of the case files we have decided that a new CAP will need to be submitted that presents the revised strategy for site remediation (i.e., groundwater extraction via a trench system, etc.) and short term mitigation measures (i.e., vapor barrier systems beneath buildings, deed restrictions, etc.) to be implemented concurrently with remediation until site cleanup goals are achieved. Our decision is due primarily to the proposed change in site use (from park and open space to residential development) and failure to achieve remedial action objectives presented in the CAP, which is due in large part to the lack of a site conceptual model (SCM) for the site. Therefore, in order to move this project towards closure and site redevelopment as expeditiously as possible, we will require you to develop a SCM that supports your proposed approach for environmental cleanup and thereby increases the success of the remedy. If the SCM identifies data gaps then additional field investigation may be necessary. As discussed in our meeting, ACEH is committed to helping move this project forward and working with your consultants in crafting a schedule that incorporates the requisite environmental cleanup process and facilitates site redevelopment.

I will formalize our decision in a forthcoming directive letter. In the meantime, as discussed in the meeting please continue to work with your consultants on preparation of the SCM and project schedule. The success of this strategy was demonstrated this week (on the other site redevelopment project that ENGEO is working on) in a three day turn around (versus the 60-day review time allotted) on our review of an initial SCM, work plan, project schedule and fact sheet.

Regards,

Dilan Roe, P.E.

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From: Roe, Dilan, Env. Health
Sent: Friday, August 03, 2012 11:48 AM
To: 'Shawn Munger'; 'Morgan Johnson'
Cc: 'Ravi@missionvalleyhomes.com'
Subject: RE: Jordan Ranch Update

Shawn:

I can't really schedule a meeting until the following week. Possible dates are 8/20 from 9:30- 11:30, 8/28 from 9:30 - 11:30, and 9/3 from, 9:30 – 11:30. Let me know if any of these times work for you.

Regards,

Dilan Roe, P.E.

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From: Shawn Munger [<mailto:SMUNGER@engeo.com>]
Sent: Friday, August 03, 2012 9:11 AM
To: Roe, Dilan, Env. Health; Morgan Johnson
Cc: 'Ravi@missionvalleyhomes.com'
Subject: RE: Jordan Ranch Update

Dilan, do you have availability 8/13, 8/14 or 8/15?

We are flexible on the time.

From: Roe, Dilan, Env. Health [<mailto:Dilan.Roe@acgov.org>]
Sent: Thursday, August 02, 2012 12:06 PM
To: Morgan Johnson
Cc: 'Ravi@missionvalleyhomes.com'; Shawn Munger
Subject: RE: Jordan Ranch Update

Hi Morgan:

I would like to schedule a meeting with ENGEO and the RP. Please provide several dates and times in the 3rd and 4th weeks of August, and the 1st week of September. Once we confirm a time and date I will send out a meeting agenda form for you and the RP(s) to fill out with the list of attendees.

Also, as previously requested, please cc the RP(s) on all future correspondence for this project.

Dilan Roe, P.E.

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From: Morgan Johnson [<mailto:mjohnson@engeo.com>]
Sent: Thursday, August 02, 2012 9:59 AM
To: Roe, Dilan, Env. Health
Cc: Shawn Munger
Subject: Jordan Ranch Update

Hello Dilan,

We wanted to give you an update on the current status of the Jordan Ranch project. We are currently preparing the Third Quarter QMR. The detected concentrations of TPHg and benzene in groundwater in the Third Quarter were similar to the previous quarter and we believe that additional removal of soil impacts will be necessary to achieve the WQOs. We are preparing a workplan to advance a limited number of Geoprobes to help us refine the limits of the additional soil removal area. The soil removal will involve extending the sidewalls of the previous UST basin excavation, under the framework of our existing Corrective Action Plan. Additionally, we have updated Geotracker as requested. On a parallel track, we've performed an initial soil gas assessment, and based on the results we have advised the Property owner that ACEH may consider allowing residential land use prior to achieving the groundwater WQOs. If you have an opening in your schedule and are able to discuss this project, we would greatly appreciate it.

Morgan Johnson, QSD
Environmental Scientist



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